

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA

v.

JOSEPH ALLEN,

Defendant.

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Criminal No. 2:24cr16

UNITED STATES' MOTION TO SEAL
GOVERNMENT'S POSITION ON SENTENCING

The United States of America respectfully moves this Court pursuant to Local Criminal Rule 49 to seal a version of the Position of the United States with Respect to Sentencing and Motion for Acceptance of Responsibility Decrease that contains two redactions that pertain to the defendant's medical history. ECF No. 37.

Sealing is necessary to avoid disclosure of sensitive information pertaining to the defendant's case. Sealing is also within the discretion of the Court and may be granted "for any legitimate prosecutorial need." *United States v. Ramey*, 791 F.2d 317, 321 (4th Cir. 1986); *see Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989).

Accordingly, the United States respectfully requests the Court grant this motion to file Position of the United States with Respect to Sentencing and Motion for Acceptance of Responsibility Decrease under seal. Further, the United States seeks permission to electronically submit the unredacted version to the case manager in the Clerk's Office for the District Court for the Eastern District of Virginia–Norfolk Division for filing under seal, unless a paper copy is requested by the Court.

Respectfully submitted,

JESSICA D. ABER
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/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of October, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which I will send a notification of such filing (NEF) to counsel of record in this case.

/s/

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